## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re:

Chapter 9

CITY OF DETROIT, MICHIGAN

Case No. 13-53846

Debtor.

Hon. Steven W. Rhodes

## NOTICE OF DEPOSITION OF CYNTHIA THOMAS

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil

Procedure 26 and 30, made applicable to this proceeding by Federal Rules of

Bankruptcy Procedure 7026 and 7030, Assured Guaranty Municipal Corp.,

formerly known as Financial Security Assurance Inc. ("Assured") and National

Public Finance Guarantee Corporation ("National"), Berkshire Hathaway

Assurance Corporation ("BHAC"), U.S. Bank National Association, as

Indenture Trustee (the "Trustee") for the DWSD Bonds, the Ad Hoc Bondholder

Committee<sup>1</sup> (the "Ad Hoc Committee"), and Oakland County, Michigan ("Oakland" and together with Assured, National, BHAC, the Trustee and the Ad Hoc Committee, the "DWSD Discovery Parties"), by and through their counsel, will take the deposition upon oral examination of **Cynthia Thomas** at the Westin Book Cadillac Detroit hotel, located at 1114 Washington Blvd, Detroit, MI 48226 on **Tuesday**, **June 24**, **2014** or at any other such date or place to which the parties mutually agree. The deposition will begin at **9:00 a.m.**, and continue until completed.<sup>2</sup>

The deposition will be taken before a court reporter or other person authorized by law to administer oaths and provide an official record of the deposition.

The deposition will be recorded by stenographic and audio visual means, for use in the above-titled action, and for any other purpose permitted under the Federal Rules of Civil Procedure and Federal Rules of Bankruptcy Procedure.

The Ad Hoc Bondholder Committee members, Fidelity Management & Research Company, Eaton Vance Management and Franklin Advisers, Inc, through various institutional funds they or their affiliates manage, hold DWSD Bonds

<sup>&</sup>lt;sup>2</sup> The DWSD Discovery Parties issue this notice jointly for the sake of efficiency and convenience only. This notice shall be treated as if each party had served the notice separately.

Dated: May 16, 2014

/s/ Lawrence A. Larose

Lawrence A. Larose Samuel S. Kohn Robert A. Schwinger CHADBOURNE & PARKE LLP 30 Rockefeller Plaza New York, NY 10112 Telephone: (212) 408-5100

Fax: (212) 541-5369
llarose@chadbourne.com
skohn@chadbourne.com
rschwinger@chadbourne.com

– and –

Robin D. Ball CHADBOURNE & PARKE LLP 350 South Grand Ave., 32nd Floor Los Angeles, CA 90071 Telephone: (213) 892-2025 Fax: (213) 892-2045

rball@chadbourne.com

Counsel for Assured Guaranty Municipal Corp.

## Respectfully submitted

/s/ Guy S. Neal
James F. Bendernagel, Jr.
Guy S. Neal
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, D.C. 20005 Telephone:
(202) 736-8041 Fax: (202) 736-8711
jbendernagel@sidley.com
gneal@sidley.com

- and -

Jeffrey E. Bjork
Gabriel MacConaill
SIDLEY AUSTIN LLP
555 West Fifth Street, Suite 4000
Los Angeles, California 90013
Telephone: (213) 896-6000
Fax: (213) 896-6600
jbjork@sidley.com
gmacconaill@sidley.com

Counsel for National Public Finance Guarantee Corp.

/s/ My Chi To My Chi To **DEBEVOISE & PLIMPTON LLP** 919 Third Avenue New York, New York 10022 Telephone: (212) 909-7435 Fax: (212) 909-6836 mcto@debevoise.com

Counsel for Berkshire Hathaway Assurance Corporation

/s/ Joseph M. Fischer Joseph M. Fischer (P13452) Robert A. Weisberg (P26698) Christopher Grosman (P58693) CARSON FISCHER, P.L.C. 4111 Andover Road, West Second Floor Bloomfield, Michigan 48302 Telephone: (248) 644-4840 Fax: (248) 644-1832 JFischer@CarsonFischer.com RWweisberg@CarsonFischer.com CGrosman@CarsonFischer.com

- and -

Sara K. MacWilliams (P67805) Jaye Quadrozzi (P71646) YOUNG & ASSOCIATES 27725 Stansbury Blvd., Suite 125 Farmington Hills, MI 48334 Telephone: (248) 353-8620 Fax: (248) 479-7828 macwilliams@youngpc.com quadrozzi@youngpc.com

Counsel for Oakland County, Michigan

/s/ David E. Lemke David E. Lemke (TN13586) Michael R. Paslay (TN11092) Ryan K. Cochran (TN25851) Courtney M. Rogers (TN25664) WALLER LANSDEN DORTCH & DAVIS, LLP 511 Union Street, Suite 2700 Nashville, Tennessee 37219 Telephone: (615) 244-6380 Fax: (615) 244-6804 david.lemke@wallerlaw.com mike.paslay@wallerlaw.com ryan.cochran@wallerlaw.com courtney.rogers@wallerlaw.com

- and -

Robert J. Diehl, Jr. (MI31264) Jaimee L. Witten (P70068) BODMAN PLC 1901 St. Antoine Street, 6th Floor Detroit, Michigan 48226 Telephone: (313) 393-7597 Fax: (313) 393-7579 rdiehl@bodmanlaw.com jwitten@bodmanlaw.com

Counsel for U.S. Bank National Association, as Indenture Trustee for the DWSD Bonds

## /s/ William W. Kannel

awalker@mintz.com

William W. Kannel
Adrienne K. Walker
MINTZ, LEVIN, COHN, FERRIS,
GLOVSKY and POPEO, P.C.
One Financial Center
Boston, Massachusetts 02111
Telephone: (617) 542-6000
Fax: (617) 542-2241
wwkannel@mintz.com

- and -

Andrew J. Gerdes ANDREW J. GERDES, P.L.C. 321 W. Lake Lansing Road P.O. Box 4190 East Lansing, Michigan 48826-4190 Telephone: (517) 853-1300 Fax: (517) 853-1301 agerdes@gerdesplc.com

Attorneys for Fidelity Management & Research Company, Eaton Vance Management, and Franklin Advisers, Inc., members of the Ad Hoc Bondholder Committee